

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
AT GREENEVILLE**

**LANCE AND CHRISTIANA TORBETT )  
as biological parents and next friends of )  
minor Plaintiff L.T., )**

**Plaintiffs, )**

**v. )**

**PROVIDENCE ACADEMY, )**

**Defendant. )**

**No. 2:25-cv-00033-DCLC-CRW  
JURY DEMANDED**

**MOTION TO SUBSTITUTE A CORRECTED  
PROPOSED AMENDED COMPLAINT**

Come the Plaintiffs, by and through counsel, and respectfully move the Court pursuant to Federal Rules of Civil Procedure 15 for the entry of an Order allowing Plaintiffs to correct and substitute the proposed Amended Complaint filed with its Motion on June 17, 2025 to more particularly clarify the facts and circumstances of the Plaintiffs' action as argued in Defendant's Motion to Dismiss, as well as delete certain actions as argued in Defendant's Motion to Dismiss. A copy of the corrected Proposed Amended Complaint is attached hereto as **Exhibit A**.

WHEREFORE, it is respectfully requested that Plaintiffs be allowed to substitute their corrected Amended Complaint and that the Proposed Amended Complaint be filed within ten (10) days of the Court ruling on the instant Motion if the Court's determination is favorable to the Plaintiffs.

Respectfully submitted this 14<sup>th</sup> day of July, 2025.

ARTHUR F. KNIGHT, III

*s/Arthur F. Knight, III*

Arthur F. Knight, III, BPR #016178

Law Office of Arthur F. Knight, III

3248 Tazewell Pike, Suite 103

Knoxville, TN 37918

P: (865) 252-0430

Email: [art@artknightlaw.com](mailto:art@artknightlaw.com)

*Attorney for Plaintiff*

### **CERTIFICATE OF SERVICE**

I hereby certify that on July 14, 2025, a copy of the foregoing Motion to Substitute a Corrected Proposed Amended Complaint was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's electronic filing system.

*/s/ Arthur F. Knight, III*

Arthur F. Knight, III